

FCC ORIGINAL

DOCKET FILE COPY ORIGINAL

RECEIVED

AUG 31 1994

FCC MAIL ROOM

Before the  
Federal Communications Commission  
Washington, D. C. 20554

IN RE: MM Docket No. 94-73  
Amendment of Section 73.202 (b) RM-8489  
Table of Allotments  
FM Broadcast Stations  
(Clarksdale, Mississippi)

COMMENTS AND COUNTERPROPOSAL OF MARVELL BROADCASTERS, MARVELL, ARKANSAS

TO THE COMMISSION:

Comes now, Marvell Broadcasters ( Hereinafter MARVELL), with comments in the above captioned proceeding, and with a counterproposal to assign channel 221A to Marvell, Arkansas as it's first local radio service.

Marvell, Arkansas has a population of approximately 1,700 persons, and is located in Eastern Arkansas. The area is primarily agricultural, with mixed light retail and manufacturing. Attached is a community profile showing Marvell to be a full fledged community, and fully deserving of a local broadcast service.

As proposed in the original petition, the channel would have been allocated to Clarksdale, Mississippi. While a larger community, Clarksdale already has the following services available:

Channel 243 C3  
Channel 268 C3  
Channel 293 C2  
Class IV AM on 1450 Khz.

Further, Clarksdale has a daily newspaper. Clearly, Clarksdale, with a population of some 21,000, is served with adequate mass media. Marvell, Arkansas, however is without local service. The fair and equitable distribution of radio service dictates that this channel be assigned to Marvell.


Should the Commission agree with the above facts, MARVELL will apply for the facilities when authorized, and will proceed without delay to build and operate the station when authorized.

Attached is Exhibit 1, an engineering summary showing that the proposed channel meets all allocation criteria of the Commission.

In Summary, MARVELL requests that the following counterproposal be adopted in this matter:

Marvell, Arkansas	Current Service	0
	ADD:	Channel 221A

Respectfully Submitted:

  
Marvell Broadcasters  
PO Box 1475  
Clarksdale, Mississippi 38614

No. of Copies rec'd  
List ABCDE

013

Engineering Summary  
Channel 221 A  
Marvell, Arkansas

FM Channel 221A is assignable to Marvell, Arkansas in full compliance with Section 73.202 of the Commission's rules. The transmitter site for the Channel will have to be located some 14 kilometers North/North East \*\* of the town of Marvell. Exhibit I, attached, shows the area in which the proposed transmitter site may be located. Further, it demonstrates that there are numerous sites in the " area to locate ", which will easily place the required 3.16 MV/M contour over the town of Marvell.

Exhibit II summarizes the required separations from other facilities for Channel 221A when allocated to Marvell, Arkansas. Please note that Station WUMS, University, Mississippi currently has a construction permit to relocate their transmitter facility. When licensed at the new site, there will be no short spacing between WUMS and this proposal.

\*\* Reference co-ordinates for this study are 34° 35' 00 NL  
90° 44' 45 WL

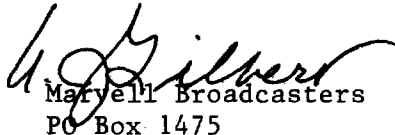
CERTIFICATE OF SERVICE

I, U. J. Gilbert, certify that I have today mailed by first class postage a copy of the enclosed comments and counterproposal to the following:

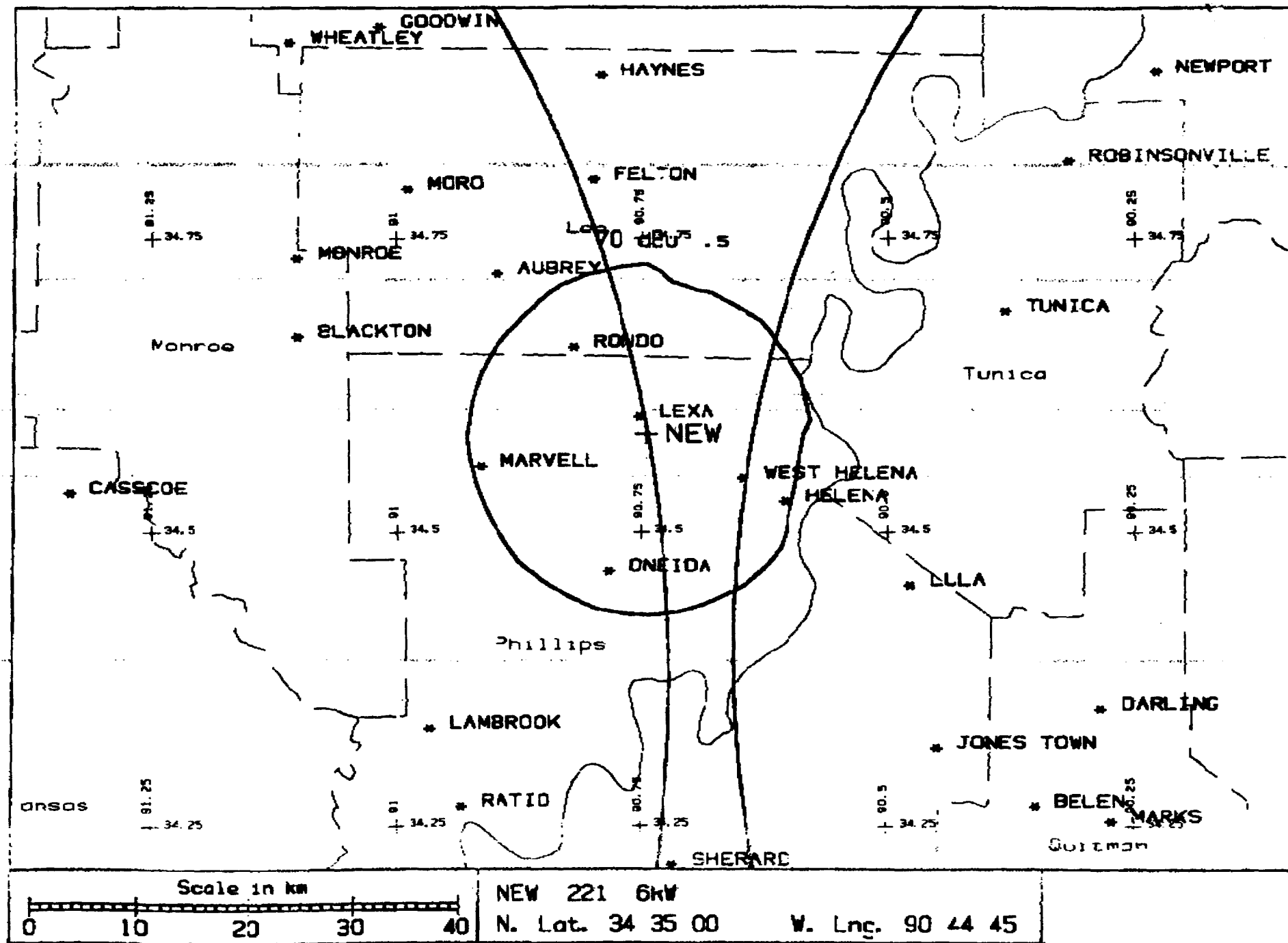
Secretary  
Federal Communications Commission  
1919 M Street  
Washington, D. C. 20554

Leroy P. Jenkins  
d/b/a Delta Blues Broadcasting  
PO Box 139  
Gunnison, Mississippi 38746

Certified as true, this the 22 day of August, 1994:

  
U. J. Gilbert  
Marvell Broadcasters  
PO Box 1475

Clarksdale, Mississippi 38614



Marvell Broadcasters  
Marvell, Arkansas

EXHIBIT II

Proposed allocation of Channel 221 A

REFERENCE	CLASS A	DISPLAY DATES
34 35 00 N	current rules spacings	DATA 06-27-94
90 44 45 W	CHANNEL 221 - 92.1 MHz	SEARCH 07-19-94

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
WUMS	221A	University	MS	102.7	113.42	115.0	-1.58 * /1
KIPR	222C1	Pine Bluff	AR	259.7	132.83	133.0	-0.17 * /2
WUMS.C	221A	University	MS	99.2	124.89	115.0	9.89
KASU	220C1	Jonesboro	AR	2.6	145.11	133.0	12.11
KASU.C	220C1	Jonesboro	AR	2.6	145.11	133.0	12.11
KASU.A	220C1	Jonesboro	AR	2.6	145.20	133.0	12.20
KASU.A	220C1	Jonesboro	AR	2.6	145.20	133.0	12.20
KWYNFM	223C3	Wynne	AR	1.7	68.41	42.0	26.41
WSMS	219C2	Memphis	TN	52.0	103.01	55.0	48.01

/1 WUMS has C. P. to change site, see line 3 above. When this is accomplished, the short spacing will be eliminated.

/2 Less than .5 kilometer, hence no shortspacing. Many sites are available.

## COMMUNITY PROFILE

### HELENA-WEST HELENA & PHILLIPS COUNTY

Prepared by the Phillips County Chamber of Commerce

JANUARY 1994

The twin cities of Helena-West Helena are located on the eastern edge of the state of Arkansas. Helena is the county seat of Phillips County. The population of the two cities is 17,186: 7,491 in Helena and 9,695 in West Helena. The population of Phillips County is 28,838.

Other towns located in Phillips County include: Elaine (pop. 991), Lakeview (pop. 609), Marvell (pop. 1,724), Barton and Lexa.

The governments of Helena and West Helena are of the mayor/council form. Information about city services may be obtained from:

City of Helena  
City Clerk  
226 Perry Street  
Helena, AR 72342  
338-6439

City of West Helena  
City Clerk  
98 Plaza St.  
West Helena, AR 72390  
572-2528

Information about county services may be obtained from:

Phillips County Clerk's office  
Court House  
600 Cherry Street  
Helena, AR 72342 338-5505

Available utilities include:

Electricity:

Arkansas Power & Light Company  
291 Richmond Drive  
West Helena, AR 72390 572-6711

Woodruff Electric Coop. Corp. (county)  
Hwy. 49  
West Helena, AR 72390 572-2800

Gas:

Arkla Gas Company  
1473 Springdale Road  
West Helena, AR 72390 572-3733

Union Gas Company of Arkansas (Marvell)  
Marvell, AR 72366 829-2206

**Water:**

Helena Water System  
702 Cherry Street  
Helena, AR 72342 338-7438

West Helena Water Utilities  
92 Plaza St.  
West Helena, AR 72390 572-6714

Elaine Water System  
Elaine, AR 72333 827-3585

Marvell Water District  
Marvell, AR 72366 829-3631

**Public School  
Information:**

Helena-West Helena Public Schools  
216 Biscoe  
Helena, AR 72342 338-8172

Barton School System (Barton & Lexa)  
Barton, AR 72312 572-7294

Marvell School System  
Marvell, AR 72366 829-2010

Elaine School System  
Elaine, AR 72333 827-6395

Lakeview School System  
Lakeview, AR 827-6863

**Private School  
Information:**

DeSoto School, Inc.  
North 4th Street Road P.O. Box 2807  
West Helena, AR 72390 572-6717

Marvell Academy  
P.O. Box 277  
Marvell, AR 72366 829-2931

Phillips County Montessori School  
1351 Springdale Rd.  
Helena, AR 72390 572-2833

West Helena Christian Academy  
P.O. Box 2616  
West Helena, AR 72390 572-6927

**Higher Education:**

Phillips County Community College  
Administrative Office  
P.O. Box 785  
Helena, AR 72342 338-6474

**Library Services:**

Helena Public Library  
623 Pecan Street  
Helena, AR 72342 338-3537

West Helena Public Library  
721 Plaza Street  
West Helena, AR 72390 572-2861

Phillips College Library  
Campus Drive  
Helena, AR 72342 338-6474

Elaine Public Library 827-6628

Marvell Public Library 829-2455

**Media:**

The Daily World - daily paper  
417 York Street  
P.O. Box 340  
Helena, AR 72342 338-9181

Phillips County Progress - biweekly paper  
631 Oakland Avenue  
Helena, AR 72342 338-9115

Delta Broadcasting - KFFA A.M./KCRI F.M.  
Radio Drive  
P.O. Box 430  
Helena, AR 72342 338-8361

KJIW Radio Station  
Hwy. 49 West  
P.O. Box 2501  
West Helena, AR 72390 572-1600

KCLT Radio Station FM  
307 Hwy. 49 Bypass  
P.O. Box 2870  
West Helena, AR 72390 572-9506

Twin City Cable TV  
528 Oakland Avenue  
Helena, AR 72342 338-3451

Mailing address:  
P.O. Box 2342  
West Helena, AR 72390

**Churches:** Approximately 20 denominations are represented in Phillips County, representing various Christian groups and the Jewish faith.



**Chamber of Commerce:** The Phillips County Chamber of Commerce serves the people of the entire community. The address is:  
P.O. Box 447  
111 Hickory Hill Drive  
Helena, AR 72342 338-8327

**Recreation:** Both the cities of Helena and West Helena maintain public parks with playgrounds, a swimming pool, picnic facilities and tennis courts. Tennis courts are also available at Phillips College. The City of West Helena maintains a public golf course. Camping facilities are available at Storm Creek Lake. Many beautiful lakes are found in the county and are ideal for fishing. Hunting is a popular sport in Phillips County.

**Culture:** Located at Phillips College is the 1,200 seat Lily Peter Auditorium, and a Fine Arts Center which includes an art gallery and banquet room. The Warfield Concert Series are held in the auditorium. This is a series of 6-8 concerts annually which are provided free to the public. The Fine Arts Center is a hub of community activity.

The Phillips County Museum is located at 623 Pecan in Helena and displays Civil War memorabilia and other artifacts.

Located near Helena's main levee on Cherry Street is the Delta Cultural Center which opened in October 1990. Admission is free. The second weekend in October, Main Street Helena holds a Blues Festival, all entertainment is free.

The community also boasts an active historical group, The Phillips County Historical Society, and the Helena Little Theatre, an amateur group with regular productions. Helena is host to an annual Tour of Homes sponsored by the Historical Society.

**Medical:** A modern 155 bed capacity hospital is located in Helena and serves the county.

**Transportation:** The twin cities are served by railroad services (Missouri-Pacific), and numerous motor carriers. Thompson-Robbins Air Field is located in West Helena. The Helena Bridge provides a Mississippi River crossing at Helena. Helena is rated fourth in the United States as a river port.

**Climate:** Phillips County's climate is sub-tropical with hot summers and mild winters. The mean annual temperature is 63 degrees, with an average daily maximum of 72 degrees and an average daily minimum of 52 degrees. Normally, January is the coldest month with a mean temperature of 43 degrees. July is the warmest month with a mean temperature of 81 degrees. Occasionally, the high temperature will exceed 100 degrees during the summer and the low during the winter will dip below 0 degrees.

The average total annual precipitation is approximately 51 inches with only light amounts of snow, sleet and hail. The normal growing season is about 220 days lasting from mid-March to mid-November. This area receives more than 60 percent possible sunshine. Prevailing winds are from the south-southwest from March to September and from the north-northwest from October to February.

## Phillips County Economic Profile

Population	1980	1990
<b>Total</b>		
White . . . . .	16,100	12,915
Black . . . . .	18,410	15,753
American Indian, Eskimo, Aleut . . . . .	61	40
Asian, Pacific Islander . . . . .	99	72
Other Race . . . . .	NA	58
Spanish Origin . . . . .	472	237
<b>Percent Of Total</b>		
White . . . . .	46.4	41.8
Black . . . . .	53.1	54.6
American Indian, Eskimo, Aleut . . . . .	0.2	0.1
Asian, Pacific Islander . . . . .	0.3	0.2
Other Race . . . . .	NA	0.2
<b>Population</b>		
20-64 years . . . . .	16,043	13,401
65 and over . . . . .	4,795	4,347
Total population, 1990 . . . . .	28,838	
Projected total population, 2000 . . . . .	27,099	

Total Personal Income By Source (\$1,000)	1990
<b>Earnings By Industry</b>	
Farm . . . . .	35,516
Agriculture, Forestry, Fishing . . . . .	2,285
Mining . . . . .	355
Construction . . . . .	8,292
Manufacturing . . . . .	32,052
Transportation, Utilities . . . . .	11,828
Wholesale Trade . . . . .	11,214
Retail Trade . . . . .	20,300
Finance, Insurance, Real Estate . . . . .	6,876
Services . . . . .	33,286
Government . . . . .	34,037
Dividends, Interest, Rent . . . . .	39,935
Transfer Payments . . . . .	102,425
Total personal income . . . . .	326,363
Per capita personal income (\$) . . . . .	11,377

**Retail Sales (\$1,000)****1990**

Total Retail Trade . . . . .	151,525
General Merchandise . . . . .	17,546
Food Stores . . . . .	38,206
Automotive . . . . .	32,837
Drug . . . . .	7,032
Eating, Drinking Places . . . . .	11,957
Furniture, Furnishings, Appliances . . . . .	3,793

**Business Census (\$1,000)****1987**

Total Wholesale Sales . . . . .	80,166
Receipts from service industries	
Total Receipts . . . . .	20,326
Motels, Hotels . . . . .	0
Automotive Repair . . . . .	979
Amusement . . . . .	235
Health Services, except Hospitals . . . . .	11,448
Legal Services . . . . .	1,689

Labor Force	1980	% Total Workers
Workers employed in county of residence . . . . .	8,663	94.3
Workers employed outside county of residence . . . . .	527	5.7

	1975	1980	1985	1990	1991
Civilian labor force . . . . .	13,050	12,000	10,975	9,800	9,625
Employment . . . . .	11,650	10,650	9,225	8,675	8,575
Unemployment . . . . .	1,400	1,350	1,750	1,125	1,050
Rate . . . . .	10.7	11.3	15.9	11.5	10.9
Nonagricultural Wage and Salary . . . . .	8,525	8,850	7,800	7,725	7,850
Manufacturing . . . . .	2,500	2,025	1,675	1,625	1,575
Service Producing . . . . .	6,025	6,825	6,125	6,100	6,275
Agricultural Employment . . . . .	1,550	1,150	1,075	1,000	975

**Education****1990****Years Of School Completed By Population****18 years and over**

Percent completing 4 years of high school . . . . .	52.9
Percent completing 4 years of college . . . . .	8.1

<b>Housing Data</b>	<b>Total Units</b>
<b>Tenure by units in structure, 1990</b>	
1 unit . . . . .	8,215
2 to 4 units . . . . .	1,429
5 or more units . . . . .	436
Mobile Home, Trailer, Other . . . . .	1,014
Total units . . . . .	11,088
Owner occupied . . . . .	5,470
Renter occupied . . . . .	4,713
Median value, 1990 . . . . .	\$36,900
Median contract rent, 1990 . . . . .	\$ 135